



April 9, 2025

The Honorable Valerie Figueredo
United States District Court, Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *In re DiDi Global Inc. Secs. Litig., No. 1:21-cv-05807*

Dear Judge Figueredo:

We represent Lead Plaintiff Alaka Holdings Ltd., and named plaintiffs Shereen El-Nahas, Daniil Alimov, Bosco Wang, and Njal Larson (collectively, “Plaintiffs”), in the above-referenced matter. Pursuant to the Confidentiality Stipulation and Protective Order, entered on May 22, 2024 (ECF 190), SDNY Local ECF Rule 6.8, and Your Honor’s Individual Practices in Civil Cases, we write to request permission to: (1) file Plaintiffs’ Reply in Further Support of Motion for Class Certification with redactions; (2) file under seal the supporting Declaration of Dr. Rajesh Aggarwal (“Aggarwal Decl.”); (3) file under seal three of the exhibits attached to the supporting Declaration of Laurence M. Rosen (“Rosen Decl.”); and (4) file the Rosen Decl. with redactions.

First, Plaintiffs informed counsel for Defendant Goldman Sachs (“GS”) that Plaintiffs intend to file materials obtained in discovery that GS has designated “ATTORNEYS’ EYES ONLY” under the Protective Order and reference those materials in their brief. Absent a consent of the designating party or a contrary Order from this Court, the Protective Order requires Plaintiffs to file the above-referenced documents under seal. ECF 190, at ¶14 (“Absent the consent of the producing party under this Section or order of the Court, the receiving party shall file the Confidential or Attorney’s Eyes Only Information under seal.”) GS has designated the materials at issue “ATTORNEYS’ EYES ONLY” pursuant to the Protective Order. GS requested that Plaintiffs file these materials, and references thereto, under seal. These materials are attached as Exhibits 1 and 2 to the Rosen Decl. and referenced in the Rosen Decl., the Aggarwal Decl. and the body of the brief.

Second, Plaintiffs request that excerpts of the deposition of Lead Plaintiff Alaka Holdings Ltd., attached as Exhibit 4 to the Rosen Decl., be filed under seal, and that excerpts quoted in the brief be publicly redacted. Lead Plaintiff has designated the transcript as confidential pursuant to ¶14 of the Protective Order.

Plaintiffs are publicly filing a redacted version of their Reply in Further Support of Motion for Class Certification with placeholder exhibits and electronically filing under seal a copy of the

Reply with unredacted exhibits. The Appendix below lists the parties and their counsel of record who should have access to the sealed documents.

Dated: April 9, 2025

Respectfully submitted,

/s/ Laurence Rosen

Laurence Rosen

cc: All counsel of record via ECF

MEMO ENDORSED


HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE

Dated: 4/10/2025

The motion to seal will be resolved with the motion for class certification. Plaintiff is directed to make a showing to permanently seal the documents under Lugosch v. Pyramid Co. of Onondaga, 435 F.3d 110 (2d Cir. 2006) by May 1, 2025.

Appendix

Defendants

Defendants Goldman Sachs (Asia) L.L.C., Morgan Stanley & Co. LLC, J.P. Morgan Securities LLC, BofA Securities Inc., Barclays Capital Inc., Citigroup Global Markets Inc., China Renaissance Securities (US) Inc., HSBC Securities (USA) Inc., UBS Securities LLC, and Mizuho Securities USA LLC

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Defendants Will Wei Cheng, Alan Yue Zhuo, Jean Qing Liu, Jingshi Zhu, and Adria Perica

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